



Koala Strategy Submissions
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Introduction

Thank you for the opportunity to comment on the proposed NSW whole-of-government koala strategy and the Draft Saving Our Species Iconic Koala Project.

We applaud the former Minister, Mark Speakman requesting the Chief Scientist & Engineer to review the decline of koala populations in key areas of NSW. The report document and additional case study into the koala populations of Coffs Harbour, the Pilliga Forests, Liverpool Plains and Gunnedah, Campbelltown and the South Coast bring together useful background and context for what needs to be done to halt koala decline, adding to the information contained in the Approved Koala Recovery Plan of nearly a decade ago. It also alludes to some of the extensive applied research in progress, which should expedite some aspects of the task ahead.

That NSW's koalas presently account for not much more than 10% of Australia's wild koalas is nothing in which any of us can take pride. Collectively we have a duty of care to ensure that the iconic koala not only survives in NSW but flourishes across its range.

We welcome bold, visible leadership from the NSW government in this endeavour.

Friends of the Koala. Inc.

This submission is made on behalf of Friends of the Koala, the peak koala conservation organisation in the Northern Rivers region of NSW. Established in 1986, we are an entirely voluntary, grass-roots organisation which aspires to make a key contribution to Australia's biodiversity by ensuring the protection and conservation of the iconic koala and the preservation and extension of koala habitat. Our core business encompasses koala habitat protection and regeneration; licensed koala rescue, rehabilitation and release; community education and engagement; advocacy for policy reform which will support koala survival; and research assistance. We maintain a regional Koala Care and Education Centre in East Lismore.

Friends of the Koala's licensed work is limited to the Richmond River, Tweed-Kyogle and Byron Coast areas of the NSW National Parks and Wildlife Service's Northern Rivers Region. It encompasses the local government areas of Richmond Valley, Lismore, Ballina, Byron, Tweed, Kyogle and small parts of Clarence Valley and Tenterfield – a land area of over 10,500km². Our focus is the urban, peri-urban and rural-urban interface: those localities where there are people to report incidences requiring intervention and koala sightings. We are not expert in every aspect of koala conservation; however we strive to maintain a holistic perspective through a broad range of partnerships.

Friends of the Koala has long contended that our existence is due in large part to having to deal with the consequences of government policies and decisions which allow inappropriate development and other anthropogenic economic activities to impact so adversely on koala populations.

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Our work is overwhelming, relentless and emotionally draining. Through our 24/7 koala rescue service we admit around 300 koalas annually. This number has been remarkably stable since 2009. Around 15% of the koalas we admit are released back into the wild. Well over 60% of annual mortalities result from euthanasia, a heartbreaking statistic for our members who join Friends of the Koala to save koalas.

More information about Friends of the Koala's holistic approach to koala management and conservation is on our website at www.friendsofthekoala.org. It is also disseminated through a quarterly newsletter, *Treetops* and published Annual Reports.

Northern Rivers Koalas – a priority population

The koala populations persisting across the Northern Rivers region may number between 3,700 – 5,000 animals. Their circumstances vary enormously, from areas of relatively high density to low; from urban and peri-urban locations through landscapes (which include colonised planted windbreaks) fragmented by agricultural pursuits, to public and private forests and the protected Parks Estate. The population between the Tweed and Brunswick Rivers east of the Pacific Highway was declared endangered by the NSW Scientific Committee in April 2016.

We note that the Chief Scientist quoted decline in the State's koala populations at the rate of 26% over the past three koala generations and the next three generations. The study from which the figure was taken estimates the decline for the North Coast Bioregion in which we are located at 50% over the past three generations and the next three.

We are only too conscious that our region supports one of the most densely human populated rural communities in NSW and that it is a part of the fastest growing area in Australia. The population was 283,500 in 2011 and is projected to increase to 380,500 by 2036. Mega residential projects such as Kings Forest on the Tweed Coast and the West Byron Urban Release Area on the Byron Coast and the upgrade of the Pacific Highway (Sections 8, 9 and 10) will have a massive impact on koala survival. Even away from the coast urbanisation and associated infrastructure is ongoing, chipping away at still viable patches of koala habitat. As I write a 150 allotment rural-subdivision rezoning application right in the middle of a "Critical Koala Precinct" and which has the potential to "tip" urban Lismore's koala population is before Lismore City Council.

Across the border, south east Queensland is projected to grow by well over a million people during the same period. Of this growth, around 350,000 more people will reside in the directly adjoining areas of the Gold Coast and Beaudesert, taking that population up to nearly 900,000. The existing and increased recreational use of our region by neighbours to the north that we can expect into the future are another pressure confronting koala survival.

The poor state of native forest health brought about by the emergence a decade ago of intensive harvesting practices in public forests, the expansion of Bell Miner Associated Dieback (BMAD) and the burgeoning number of active Private Native Forestry licences, are also seriously impacting on koala numbers in parts of our region.

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Overview of this submission

The first part of this submission deals with the eleven recommendations of the *Report of the Independent Review into the Decline of Koala Populations in Key Areas for NSW* on which the koala strategy is to be based.

The second part addresses the *Draft Saving Our Species Iconic Koala Project* including the proposed Priorities Action Statement (PAS) amendment.

Friends of the Koala has commented separately on the Review of State Environmental Planning Policy No.44 – Koala Habitat Protections (SEPP 44) and the Explanation of Intended Effect of the amendments proposed.

Report of the Independent Review into the Decline of Koala Populations in Key Areas for NSW

Before proceeding to our review of the Chief Scientist's recommendations, we make a couple of preliminary comments:

(a) The Report's recognition of the front-line role played by koala rehabilitation groups is appreciated. We trust we have already made the point that rehabilitation groups' conservation contribution often extends way beyond assisting the recovery of individual koalas.

(b) We are disappointed that the Report's recommendations fall short of preventing the key, overarching cause of koala collapse which is anthropogenically-induced changes to habitat to which these iconic animals have little or no time to adapt.

Recommendation 1

That Government adopt a whole-of-government koala strategy for NSW with the objective of stabilising and starting to increase koala numbers

We are pleased to note that setting out a framework for a whole-of-government approach to addressing pressures was in the investigation's terms of reference.

While we support the whole-of-government model, we recommend that:

- Whole of government is just that and not restricted to the agencies represented on the investigation committee (e.g. absence of Department of Local Government)
- The Office of Environment and Heritage (OEH) is resourced to deliver strong leadership
- Government clearly directs agencies to collaborate with an inter-agency forum to transparently review and report; - i.e. more use of "must" not "should"
- Koala protection provisions of all legislative and regulatory instruments directly or indirectly impacting on koalas and their habitat must be strengthened and brought into alignment across departments.

Recommendation 2

That government initiate a program to improve data on the number, location and occurrence of koalas in NSW, including trends over time, taking advantage of new sensor and communication technologies and data analytics within 12 months of receipt of this report.

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We support such a program to enhance knowledge of koala populations and trends, however we recommend that:

- Existing data such as that collected by Friends of the Koala since 1989, primarily but not entirely to fulfil our licence conditions (e.g. sightings reports have been encouraged over the past decade or so), is not overlooked.

Recommendation 3

That Government publish a state-wide predictive koala habitat map within three years of receipt of this report, with immediate priority given to improving coverage of the north coast.

Friends of the Koala supports a cross-tenure predictive koala habitat mapping project. We understand that such a map for the north coast should be published around July 2017. We do hold concerns about the capacity of such mapping to capture koala habitat as it presents across the very disturbed landscape that characterises much of the Northern Rivers.

Taking as an example the Lismore area where the koala population is acknowledged to be fragile but apparently stable, we ask, how will the mapping project deal with paddock trees, planted windbreaks and garden [koala feed] trees, weeds such as Camphor Laurel, and Macadamia orchards all of which (and more) are essential to present koala survival?

Also, some Northern Rivers councils have fine scale vegetation mapping and koala habitat maps which should be incorporated into any state-wide maps.

We recommend that:

- The predictive koala habitat map for the north coast, in preparation, reflects known contemporaneous koala use of the landscape as well as “important” areas of occupied and unoccupied koala habitat.
- Areas in which fine scale vegetation and koala habitat maps have not been developed must be prioritised.

Recommendation 4

That Government improve outcomes for koalas through changes to the planning system.

In our view this recommendation needs to go further and require the planning system to unequivocally protect koala habitat. For far too long the cornerstone instrument, State Environment Planning Policy No. 44 – Koala Habitat Protection (SEPP 44) has been applied to **enable** development subject to conditions, not to stop it. On top of that Northern Rivers’ councils have been saddled with restrictive criteria for applying E2 and E3 zones and environmental overlays in their Local Environment Plans. Even so the irresponsibility of Lismore City Council resolving to make environmental protection zones voluntary on agricultural land a few weeks ago demonstrates the contempt with which some hold the planning system’s capacity for environmental protection.

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We are also aware that changes to the *Environmental Planning and Assessment Act 1979* are presently on public exhibition. While we understand that a complete re-write of the planning system is not on the table and that other changes are under active consideration, we are disappointed that recognition of regional community interest groups such as ourselves as “neighbours” in the “early consultation” provisions for improving community participation is not a priority in the immediate future.

Friends of the Koala’s comments on the review and the Explanation of Intended Effect of the amendments proposed to SEPP 44 were submitted in December 2016. We support EDO NSW’s more recent response dated January 2017.

While we believe the Report’s call for a broad evaluation of the SEPP’s effectiveness (including SEPP- compliant Comprehensive Koala Plans of Management (CKPoMs) in protecting koalas and their habitat is important, we point out that the four which have been prepared in the Northern Rivers are of quite recent origin. Indeed, the only approved CKPoM is Lismore’s, in 2013.

We recommend that:

- The NSW planning system ensures absolute protection of koalas and their habitat by (a) demanding and (b) supporting in law the identification and protection of development “no go” zones in Local Environment Plans and that they carry over into koalas plans of management made under State Environment Planning Policy No. 44 – Koala Habitat Protection (SEPP 44).
- Priority be given to including *bona fide* community interest groups in the early consultation provisions of the new *Environmental Planning and Assessment Amendment Act*

Recommendation 5

That Government improve outcomes for koalas through the Biodiversity Conservation Bill and associated Regulations

This recommendation truly demonstrates the contradictions of government policy development. Even as weakened land clearing controls were being promulgated in new legislation, the Chief Scientist’s committee was identifying them as evidence from which government can act to turn around koala declines.

WWF Australia estimated as much as 2.2 million ha of koala habitat could be at risk from the Equity Code that allows 625 ha of native vegetation to be cleared in any 3-year period. Paddock trees and clumps that provide koalas with stepping stones across the landscape could also suffer under the so-called Efficiency Code.

We are gravely concerned with the new legislation’s dependence on biodiversity offsets. Koalas have relatively fixed home ranges thus habitat loss through vegetation clearance means koalas using that area are impacted. Retaining some habitat (often suboptimal), planting trees (that take years before use), and acquiring habitat nowhere near their home range will be detrimental to that population’s survival. At best offsets can achieve no more than the survival of one koala population at the expense of another.

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We recommend that:

- Government exempts koala habitat from code-based clearing under the Biodiversity Conservation Act and associated Regulations.

Failing that:

- The Biodiversity Conservation Act and associated Regulations protect koala habitat by:
 - (a) Ensuring that koala habitat maps are suitable for use through the Act and Regulations
 - (b) Ensuring that koala habitat is included in Category 2 (Regulated Land) on the native vegetation regulatory map and identifying and implementing appropriate controls
 - (c) Including predictive koala habitat and likelihood of koala occupancy information in the Biodiversity Assessment Method (BAM) threshold sensitive values map
 - (d) Including impacts on the best quality koala habitat as 'serious and irreversible impacts'
 - (e) Including koalas in the monitoring programs to be established under the legislation.

Recommendation 6

That Government investigate models for guiding and incentivising collaborative best practice for new development and ongoing land use occurring in areas of known koala populations across tenures, industries and land users.

Our view is that new developments must not occur in areas of known koala populations, nor in areas identified as preferred [although unoccupied] koala habitat. We support the recommendation where developments are already approved in areas of known koala populations.

Recommendation 7

That Government agencies identify priority areas of land across tenures to target for koala conservation management and threat mitigation

We support this recommendation in principle and we agree that the north coast be given priority. Although Friends of the Koala is not a land manager we are a long-standing stakeholder in the Border Ranges Alliance of the Great Eastern Ranges Initiative and we work with a range of landholders across the region which could be helpful to OEH. We would be happy to be included with RMS and councils to identify koala road kill hotspots and potential preventive mitigation as well as to identify priority areas for dog control, etc.

In regard to identifying additions to the Parks Estate, Friends of the Koala supports the National Parks Association of NSW's *Blueprint for a comprehensive reserve system for koalas (Phascolarctos cinereus) on the North Coast of New South Wales* (2015) and in particular those proposals developed to date for the Northern Rivers region:

- *Western Border Ranges, subject to the agreement of the Native Title holders, covering 32,234ha over thirteen state forests including Beaury, Richmond Range, Mt Lindesay, Unumgar and Yabbra which is estimated to support over 1,000*

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- koalas. This proposal will help to link seven existing World Heritage properties and a recognised biodiversity hotspot;
- Sandy Creek National Park comprising Carwong and part of Royal Camp State Forests near Casino to protect 2,100ha of logged forest estimated to contain 50-200 koalas.
- Tweed Coastal Range National Park covering 2550ha of habitat for the endangered Tweed-Brunswick Rivers koala population of approximately 140 animals.

Last year's Crown Lands Parliamentary Inquiry, to which Friends of the Koala provided evidence may identify additional possibilities, e.g. land supporting koalas around Wardell which is owned by the Jali Local Aboriginal Land Council might be considered for inclusion in the Ngunya Jargooh Indigenous Protected Area.

We also draw attention to the urgent need for better understanding of the role of the National Parks Estate in supporting key populations and koala habitat. We have more to say about this under Recommendation 8 and also in our remarks about the Saving Our Species Iconic Koala Project.

We seriously question the effectiveness of land acquisition announced by the previous Minister in December 2016. \$10m over five years will not go far, particularly on the north coast. A more cost-effective strategy in our view would be to extend protection of koala habitat on public land by buying out logging licences in state forests known to support important koala populations (e.g. Carwong and Royal Camp State Forests).

We recommend that:

- Government gives priority to protecting koala habitat on public land, extending such protected areas by strategic "buy backs" of logging licences and that private land acquisition complement this priority.

Recommendation 8

That Government, through the Office of Environment and Heritage, convene two symposia within 12 months of receiving this report: one for scientists active in koala research and land managers to develop a koala research plan; and one focussed on koala rehabilitation to identify actions to optimise the delivery of and support for the network of koala rehabilitation groups and carers.

Again, we support this recommendation in principle. It is entirely understandable that the review has generated a number of research priorities. Of those listed we wonder why informing disease research including chlamydia and koala retrovirus (KoRV) is specifically tied to the Koala Genome Consortium which is certainly not the only source of information for koala disease research. A broad community of koala disease researchers is working in pathology, microbiology/ virology/parasitology, immunology, clinical science, epidemiology, and disease ecology. Added to these are the managers of koalas, either clinically in koala hospitals/care centres, or as populations.

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Development of a koala research plan is essential but we suggest that as well as scientists and land managers, koala rehabilitation groups and local government officers are included in the biennial symposia proposed. Friends of the Koala has long-standing links with several universities and independent researchers engaged in koala research. We are currently a partner in three Australian Research Council [ARC] Linkage Projects and we are delivering two Environmental Trust funded projects (Rehabilitation and Restoration and Environmental Education programs).

While we totally support a priority research project on the impact on koalas of regeneration harvesting forestry operations and would like to see it extended to the Northern Rivers, we express our disappointment at the Report's lack of a recommendation specifically addressing the treatment of koalas in native forestry operations under the Integrated Forestry Operations Approvals (IFOAs) Remake and in the Private Native Forestry Code of Practice.

We recommend that:

- The symposia proposed to develop a koala research plan take account of the broad community of koala disease researchers and includes koala rehabilitation groups as well as scientists active in koala research and land managers.
- Pending the outcome of the priority research project on the impact on koalas of regeneration harvesting forestry operations, a moratorium on logging koala habitat is imposed immediately.
- Protections for koala habitat are strengthened by the review of the Private Native Forestry Code of Practice.

In regard to the koala rehabilitation symposia, we participated in the excellent Koala Carer Workshop hosted by OEH on 1 February which in part served to consult with the sector on input into the koala strategy proposal. We sincerely trust that future workshops will be held and a solid framework developed for better collaboration between licensed koala rehabilitation groups and carers.

Actions that would support Friends of the Koala's work and assist us to optimise service delivery include:

- Knowledge access – affordable (i.e. free) access to the scientific literature
- Developing standardised treatment protocols
- Supporting veterinarians – specialist training, networking, service recognition, financial
- Standardisation and central storage of koala medical records
- Standardisation of data collection to fulfil internal clinical/treatment needs, NPWS licence requirements, entry into the NSW Wildlife Atlas/BioNet, sharing with researchers, etc. (i.e. a single koala-specific database capable of reporting for all of the above purposes and more)
- Facilitating entry of our retrospective datasets into the NSW Wildlife Atlas/BioNet
- Facilitating and supporting training including associated materials, equipment, etc.
- Affordable access (i.e. free) to disease testing via the University of Sydney's Koala Health Hub

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- Continuation of scientific investigative work on pharmaceutical treatments of chlamydia
- Review of the *Code of Practice for Injured, Sick and Orphaned Koalas* (2011) including re-examining euthanasia protocols, especially in regard to female koalas with ovarian bursal cysts
- Subsidised microchipping
- Scientific partnerships to assist us analyse and interpret our records and improve our understanding of ecological and population issues
- Championing the contribution to koala conservation made by the koala rehabilitation sector (to government, scientists, mainstream environmental organisations and the general community)
- An Environmental Trust Grant Program dedicated to koala/wildlife rehabilitation sector
- Establishment of a government-funded specialist koala research veterinary clinic in Lismore
- Resolution of cross-border issues associated with the provision of convenient, Queensland-based specialist koala veterinary services
- Investigation of the potential for on-Park release sites and development of appropriate protocols

Further to the possibility of on-Park release sites, we point out that in many parts of the Northern Rivers 'suitable habitat' for koalas is fast disappearing. Effective koala recovery is predicated on a landscape-scale management framework. The Report says that the national parks estate "... has a key role to play in protecting koalas", yet OEH admits little is known about the distribution of koalas within the reserve system.

Numerous Plans of Management for parks and reserves across the Northern Rivers region list actions which specifically mention koalas. The feasibility of utilising some of those parks and reserves for release sites for rehabilitated koalas whose habitat is unviable needs investigating and if appropriate, protocols developed.

Recommendation 9

That Government establish the Australian Museum as a preferred repository for koala genetic samples in NSW, and all data and metadata associated with these samples should be deposited into the SEED Environmental Data Portal (extended if necessary to include flora and fauna).

We support the collection of genetic samples and have engaged in taking tissue from deceased koalas (on and off) for more than a decade. Samples have tended to be provided directly to researchers although in response to a request from the Australian Museum we provided approximately 80 samples to them during 2016.

While we have nothing but admiration for the work undertaken by the Australian Museum Research Institute's 'Team Koala', we do question whether relying on a single institution is sound practice. We also believe that obligatory blanket sampling may be wasted effort, i.e. a targeted geographic representation of tissue samples would be more productive.

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But why stop at genetic sampling? Why not take the same opportunity to collect and store material for disease researchers (see our remarks under Recommendation 8)? Most if not all koala rehabilitation groups carry out necropsies on selected, if not all mortalities. Most are sharing at least some of that information with the University of Sydney via the Koala Health Hub. It makes sense to develop a protocol for collecting such material.

Access via the very new Sharing and Enabling Environmental Database [SEED] Portal may well be feasible, but surely its extension will require developmental involvement similar to that which has already occurred to get it off the ground?

We recommend that:

- Genetic samples be collected and stored in diverse institutions
- Sample collection be targeted to ensure full geographic coverage
- Collection and storage of materials of assistance to disease researchers is expeditiously explored, perhaps in the first instance with the Director of the University of Sydney's Koala Health Hub.

Recommendation 10

That Government facilitate the exchange of information among land managers, local government, the research community and the broader community.

We would like to see koala rehabilitation groups identified in this recommendation.

In the Northern Rivers investment in koala conservation by the three levels of government and the community is already quite high; indeed formulating mechanisms for measuring what is a somewhat fragmented effort is long overdue. Even a group like ours which has been operating for 30 years with a degree of organisational continuity and with a variety of partners has trouble in keeping tabs on who is doing what; much less how well they are doing it.

We have already commented on the SEED Portal. It seems to us that some regional co-ordination will also be desirable, a role that Friends of the Koala is already informally fulfilling due to our holistic koala conservation mission and our regional reach.

Needless to say, the proposed state-wide strategy must support and complement the considerable body of koala conservation work that is already being undertaken locally and regionally.

Recommendation 11

That Government draws on knowledge and shares information with local community members through a program that supports localised engagement between liaison people and residents and industry.

We agree that information sharing will be fundamental in developing the koala strategy and in communicating and delivering local initiatives. Clearly though, more thought needs to be applied by Government to identifying a range of possibilities for achieving it.

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Capacity for leveraging funds to deliver landscape-scale, long-term, multidisciplinary projects, e.g. the Federally-funded Tweed Byron Koala Connections project, is surely an extremely important aspect of localised engagement.

We recommend that:

- Local government, possibly through their regional organisation of councils (ROCs), are approached to take on co-ordination of local information-sharing and initiative delivery.

We also recommend an additional recommendation addressing forest health and the control of BMAD.

Draft Saving Our Species Iconic Koala Project

This five-year Project is to provide the framework and funding for delivering some of the strategy's components and will guide on-ground koala management through the amended Priorities Action Statement until 2020-21, so the delayed announcement of the 2016-17 funded projects coming half way into the financial year is extremely unfortunate.

The haphazard consultation around the Project, the pressure put on local government to submit projects costed at several million dollars (between 10 and 20 million we understand) early in 2016 for an allocation of \$800,000, the inherent watering-down of environmental protections in the *Biodiversity Conservation Act* and yet another restructuring in OEH have also added a considerable degree of cynicism to the government's sincerity and capacity for effective koala conservation.

We believe it would be helpful to all stakeholders to know how much Government intends spending on koala conservation from the expanded Saving our Species funding of \$100 million over five years.

State-wide actions recommended for prioritisation

1. Promoting the NSW whole-of-government Koala Strategy

We can find no reference to any intention for Government to invest in a concerted, state-wide media publicity campaign to promote to the NSW community at large its commitment to recovering the State's koala populations and the community engagement that will be required for success.

We believe that the NSW community and visitors to our State will welcome knowing that Government cares for koalas enough to be leading the conservation effort for their recovery. An innovative campaign could well be a vote-winner!

2. Support for licensed koala rehabilitation providers

In our view, this project which is costed at \$54,500 in 2016-17 and is still being scoped in consultation with the sector (via a workshop and separate submission such as this), will require prioritisation (i.e. funding) into future years.

Our understanding is that priority will be given to triage and data requirements and to genetic sampling over the remainder of this financial year. We sincerely trust that

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any unexpended monies will be carried forward into 2017-18 and added to, of course.

3. Status and management of koalas in the NSW National Parks Estate (see also Recommendations 7 and 8 above)

Park-precinct development and optimising use of park assets to be achieved by encouraging private investment, adapting existing facilities and creating new tourism and visitor experiences, is a state-wide OEH target for 2016-17.

In the Northern Rivers some parks are being used by horse-riders and mountain-bikers and alternatives to high volume tourism destinations such as Wollumbin and Cape Byron are being explored. At the same time the role of the reserve system in supporting key koala populations and their habitat is not well understood. In our view a rapid and robust investigation of present and potential koala use to complement the cross-tenure predictive koala habitat mapping project presently underway on the north coast (see Recommendation 2) needs to be given priority to ascertain present occupation, possible carrying capacity* and even tourism potential.

*Although our primary interest is in the possibility of release sites for rehabilitated koalas or koalas whose habitat is unviable, we draw your attention to the recently announced program of assisted breeding from wild koalas to genetically re-invigorate fragmented and isolated populations in South-east Queensland being undertaken by a partnership between the University of Queensland, the Queensland Institute of Technology and the Dreamworld Wildlife Foundation.

4. Koala Citizen Science Community of Practice

Delivering the OEH Citizen Science Strategy 2016-18 is another state-wide OEH target for 2016-17. We understand that the Koala Citizen Science Community of Practice is an OEH undertaking which is supported by the Saving Our Species program although not presently funded.

A consortium led by the University of Sydney recently lodged an application for \$500,000 from a Federal Citizen Science Grant program for a project titled: *Koala Communities: people working together for koala conservation*. Should the grant application fail, we recommend that rolling-out the Koala Citizen Science Community of Practice is funded from the Iconic Koala Project.

Regional and local actions recommended for prioritisation

When scoping of the *Support for licensed koala rehabilitation providers* project is finalised, we expect actions suited to regional and local application will be identified.

After disease, road kill is the second highest cause of reported koala mortality in the Northern Rivers, thus we have a strong interest in actions focussing on driver behaviour and mitigation measures designed to keep koalas off roads. To demonstrate the impacts, one of several roads in our region which is a major cause of koala mortality is the Lismore to Bangalow

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Road. From the beginning of 2011 to the end of 2015, we recorded 19 koala mortalities on the road outside the urban areas of Lismore and Bangalow which both have koala populations. This number does not include mortalities on feeder roads in the vicinity. These were the deaths we know about; sadly, many road-hits are simply not reported. A copy of our submission to the [RMS] Lismore to Bangalow Road Draft Corridor Strategy in May 2016 is available if required. We are also forwarding a dataset of regional road incidents to the Policy team, separate to this submission.

Due to Friends of the Koala's close working relationship with local government across the Northern Rivers region, we would as a general rule, be guided by the priorities identified by our council partners.

Comments on the draft action toolbox (proposed PAS amendment)

We note that the draft action toolbox is the list of actions proposed to amend, but not to replace apparently, the existing PAS adopted in 2014.

The proposed amendment is a far more generalised list of actions than the 2014 list. Although it is suggested that "many" of those actions are likely to be addressed by the whole-of-government strategy, that remains to be seen.

Recognising that some of the 2014 actions are no longer relevant, we recommend release and circulation of a report on progress in implementing the adopted PAS. Those actions which will be addressed by the finalised strategy must be clearly identified.

In any case, the draft action toolbox clearly does not address issues such as coastal development, land clearing, logging, and the need for additional protected areas for koalas, i.e. the over-arching necessity for all legislative and regulatory instruments directly or indirectly impacting on koalas and their habitat to be strengthened and brought into alignment.

Conclusion

Friends of the Koala's preference is, wherever possible, to work with Government to improve outcomes for koala survival. We trust therefore, that our comments will be taken in the spirit in which they are offered.

We welcome the NSW Government's initiative in proposing a whole-of-government koala strategy. We reiterate our position that the recommendations in their current form are not sufficient to achieve the strategy's objective of first stabilising and then starting to increase koala numbers.

Finally, a word on consultation - the three-month consultation period appears generous, however spanning the summer holidays undoubtedly halved the time for "responders" to prepare our comments. The community information sessions only commenced in the second week of February, less than a month prior to the deadline for submissions.

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Indeed, the format of the sessions was not that helpful to many. The “drop-in” style presumes a level of knowledge and a capacity for one-on-one discussion that can present difficulties for some. Yesterday we attended an exemplar community information session conducted by your Planning colleagues on the Environmental Planning and Assessment Amendment Bill 2017 which consisted of several presentations and ample questioning time between, with more at the end for the really keen. We suggest that OEH uses this model for future community sessions.

Should you seek further information about anything in this submission, or indeed, if we can assist with data, please do not hesitate to contact the undersigned on 6629 8388.

Yours sincerely

Lorraine Vass
President
3 March 2017

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